



Financial Crimes Enforcement Network

FinCEN Currency Transaction Report (FinCEN CTR) Electronic Filing Instructions

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FinCEN CTR Electronic Filing Instructions

The following instructions apply only to the electronic filing of the FinCEN Currency Transaction Report (FinCEN CTR), FinCEN Form 112, through FinCEN's BSA E-Filing System. Unless specifically mentioned in the text, these instructions do not apply to any other current or prior Bank Secrecy Act reports.

Filing Prohibition

The FinCEN CTR should not be filed for suspicious transactions involving \$10,000 or less in currency or to note that a transaction of more than \$10,000 is suspicious. Any suspicious or unusual activity should be reported by a financial institution using the FinCEN Suspicious Activity Report (FinCEN SAR), FinCEN Form 111. If a transaction is suspicious and in excess of \$10,000 in currency, then both a FinCEN CTR and a FinCEN SAR must be filed. In situations involving suspicious transactions requiring immediate attention, such as when a reportable transaction is ongoing, the financial institution shall immediately notify, by telephone, appropriate law enforcement and regulatory authorities in addition to filing a timely FinCEN SAR.

General Instructions

1. Who must file: Each financial institution (other than the U.S. Postal Service, for which there are separate rules) must file a FinCEN CTR for each deposit, withdrawal, exchange of currency, or other payment or transfer, by, through, or to the financial institution which involves a transaction in currency of more than \$10,000. Multiple transactions must be treated as a single transaction if the financial institution has knowledge that they are by or on behalf of the same person and they result in either currency received (cash in) or currency disbursed (cash out) by the financial institution totaling more than \$10,000 during any one business day. For a bank, a business day is the day on which transactions are routinely posted to customers' accounts, as normally communicated to depository customers. The business day for casinos is based on the gaming day, which is the normal business day of the casino by which it keeps its books and records for business, accounting, and tax purposes. For all other financial institutions, a business day is a calendar day. Generally, financial institutions are defined as banks, other types of depository institutions, casinos and card clubs, brokers or dealers in securities, money transmitters, currency exchangers, check cashers, and issuers/sellers/payers of money orders and traveler's checks. Only those casinos, gambling casinos, or card clubs in the United States that have gross annual gaming revenues in excess of \$1 million are financial institutions for purposes of the FinCEN CTR. The FinCEN CTR should not be used to report receipts of currency in excess of \$10,000 by any non-gaming businesses of a casino (e.g., a hotel). Instead, such transactions should be reported on Form 8300, Report of Cash Payments Over \$10,000 Received in a Trade or Business. Casinos, gambling casinos, or card clubs with gross annual gaming revenues that are less than \$1 million are not financial institutions for purposes of the FinCEN CTR and should report all transactions in currency greater than \$10,000 on Form 8300.

Additional information on financial institutions required to report currency transactions is found in 31 CFR Chapter X.

2. Casino filing exceptions: A casino does not have to report transactions with:

- domestic banks; or
- currency dealers or exchangers, or check cashers, as defined in 31 C.F.R. § 1010.100(ff), and which are conducted pursuant to a contractual or other agreement covering the financial services in 31 C.F.R. 1021.311(a)(8), 1021.311(b)(7), and 1021.311(b)(8).

Also, a casino does not have to report the following types of transactions:

- Cash ins when they are the same physical currency previously wagered in a money play on the same table game without leaving the table;
- Bills inserted into electronic gaming devices in multiple transactions (unless a casino has knowledge pursuant to 31 C.F.R. 1021.313);
- Cash outs won in a money play when they are the same physical currency wagered, (However, when a customer increases a subsequent cash bet (*i.e.*, money play), at the same table game without departing, the increase in the amount of the currency bet would represent a new bet of currency and a transaction in currency) or,
- Jackpots from slot machines or video lottery terminals.

3. Where to file: The FinCEN CTR must be filed electronically through the Financial Crimes Enforcement Network (FinCEN) BSA E-Filing System. To obtain an application to file electronically, go to <http://bsaefiling.fincen.treas.gov/main.html>. For help in applying, contact the E-Filing Help Desk by calling 1-866-346-9478 (option 2) or via e-mail sent to BSAEFilingHelp@fincen.gov.

4. When to file: A FinCEN CTR must be filed by the 15th calendar day after the day of the transaction as defined in General Instruction 1.

5. Identification requirements: All individuals (except employees of an armored car service operating as an agent of the reporting financial institution) conducting reportable transactions for themselves or for another person, must be identified by means of an official document. Acceptable forms of identification include driver's license, military or military/dependent identification card, passport, state issued identification card, foreign cedula card, non-resident alien identification card, or any other identification document which contains name and preferably address and a photograph and is normally acceptable by financial institutions as a means of identification when cashing checks for persons other than established customers. Acceptable identification information obtained previously and maintained in the financial institution's records may be used. For example, if documents verifying an individual's identity were examined and recorded on a signature card when an account was opened, the financial

institution may rely on that information. In completing the FinCEN CTR, the financial institution must indicate on the report the method, type, and number of the identification. Statements such as “known customer” or “signature card on file” are prohibited and are not sufficient for report completion. The actual identifying information must be provided.

For casino customers granted accounts for credit, deposit, or check cashing, or on whom a previous CTRC or FinCEN CTR containing verified identity has been filed, acceptable identification information obtained previously and maintained in the casino’s internal records may be used as long as the following conditions are met. The customer’s identity is re-verified periodically, any out-of-date identifying information is updated in the internal records, and the date of each re-verification is noted on the internal record. For example, if documents verifying an individual’s identity were examined and recorded on a signature card when a deposit or credit account was opened, the casino may rely on that information as long as it is re-verified periodically. The actual identifying information must be provided. Statements that the identifying information is on file are prohibited.

6. Penalties: Civil and criminal penalties are provided for failure to file a FinCEN CTR or to supply information, or for filing a false or fraudulent FinCEN CTR. See 31 U.S.C. 5321, 5322 and 5324.

7. Definitions: For purposes of this FinCEN CTR, the terms below have the following meanings:

Currency - The coin and paper money of the United States or any other country, which is circulated and customarily used and accepted as money.

Person - An individual, corporation, partnership, trust or estate, joint stock company, association, syndicate, joint venture or other unincorporated organization or group.

Organization - Entity other than an individual.

Transaction in Currency - The physical transfer of currency from one person to another. This does not include a transfer of funds by means of bank check, bank draft, wire transfer or other written order that does not involve the physical transfer of currency.

Negotiable Instruments - All checks and drafts (including business, personal, bank, cashier’s and third-party), money orders, and promissory notes. For purposes of this FinCEN CTR, all traveler’s checks shall also be considered negotiable instruments whether or not they are in bearer form.

Exchange rate - The amount of a foreign currency that can be exchanged for a U.S. Dollar. If foreign currency is a part of a currency transaction that requires the completion of a FinCEN CTR, use the exchange rate in effect for the business day of the transaction to compute the amount, in US dollars, to enter in Items 26 and 28. The source of the exchange rate that is used will be determined by the reporting institution.

8. Recording information: Complete each FinCEN CTR by providing as much information as possible. Although all items should be completed fully and accurately, items marked with an asterisk (*) must be completed. Filers must follow the instructions for these items by providing the required data or, if instructions permit, by checking the box labeled “Unknown” to indicate that the required data was unknown or not applicable. Items that do not begin with an asterisk must be completed if the data are known and will be left blank if the data are unknown. If an item’s instructions differ from this general instruction, the item instructions must be followed. This instruction supersedes all prior instructions or guidelines issued by FinCEN on use of special responses in BSA forms when information is unknown or not available. Therefore, the use in a FinCEN CTR of special responses such as “UNKNOWN,” “NONE,” “NOT APPLICABLE,” or “XX” and their variants is now prohibited. Instructions for any previous version of the Currency Transaction Report do not apply to the FinCEN CTR.

NOTE: Throughout these instructions the phrases “check box,” “select option,” and similar wording are used to denote actions in certain data items on the discrete FinCEN CTR. These are deemed equivalent to instructions in the Electronic Filing Requirements to enter appropriate codes in the same data items in transmission files. For example, the requirement to select option 1a “Initial report” in the discrete FinCEN CTR is the equivalent of entering code “A” in “Type of Filing” in the Electronic Filing Requirements Transaction Summary (3A) Record.

9. Corrected or amended reports: A corrected report must be filed whenever errors are discovered in a previously-filed FinCEN CTR; Currency Transaction Report (CTR), FinCEN Form 104; or Currency Transaction Report by Casinos (CTR-C), FinCEN Form 103. Amended reports on FinCEN CTRs, CTRs, and CTR-Cs must be filed whenever additional data about the transactions are discovered. Both corrected and amended reports must be completed in their entirety, with the necessary corrections or amendments made to the data. In both cases box 1b “Correct/amend prior report” must be checked on the FinCEN CTR. Field 1d must contain the Document Control Number (DCN) or BSA Identifier (BSA ID) assigned to the prior filing. If the FinCEN CTR corrects or amends a CTR or CTR-C, any FinCEN CTR fields not present on the prior filing must be completed by the filer if the data are available. These instructions supersede all prior instructions and guidance on electronic filing of amended or corrected CTRs and CTR-Cs. BSA IDs, which replaced DCNs, are provided in acknowledgement records sent to member financial institutions by the BSA E-Filing System.

10. Addresses: For addresses in the U.S., Canada, or Mexico enter the permanent street address, city, two or three letter state/territory/province abbreviation or code, ZIP Code or foreign postal code, and two letter country code. Provide the apartment number or suite number, if known, following the street address. A non-location address such as a post office box or rural route number should be used only if no other street address information is available. ZIP Codes must be five or nine digits. ZIP Codes and foreign postal codes must be entered without formatting or special characters such as spaces or hyphens. For example, the ZIP Code 12354-6120 would be entered as 123546120. The foreign postal code HKW 702 would be entered HKW702. For other foreign addresses enter the street address, city, postal code, and two letter country code or

address equivalent. Leave the state item blank, including the "Unknown" box. If a foreign address contains address information that does not conform to the FinCEN CTR address format, record equivalent address information in the FinCEN CTR address items (except state) and ignore non-conforming data. Complete any address item that is known, even if the entire address is unknown. No abbreviations are permitted in city names, which must be completely spelled out. A U.S. city name should match the city name used by the U.S. Postal Service for the associated state and ZIP Code. For U.S. address use only the authorized U.S. Postal Service state, territory, or military address abbreviations found at <https://www.usps.com/ship/official-abbreviations.htm>. For Canadian provinces and territories use the Canada Post Corporation codes found at <http://www.canadapost.ca/tools/pg/manual/PGaddress-e.asp#1380608>. For Mexican states and territories use the ISO 3166-2 three-letter codes found at http://www.commondatahub.com/live/geography/state_province_region/iso_3166_2_state_codes. For all countries use the ISO 3166-1 two-letter country codes found at http://www.iso.org/iso/country_names_and_code_elements. Note: The ISO 3166-1 country list includes entries for all U.S. territories. Do not use these U.S. territory entries, which match the U.S. Postal Service abbreviations required in state fields, in any country field.

11. Telephone numbers: Record all telephone numbers, both foreign and domestic, as a single number string without formatting or special characters such as parentheses, spaces, or hyphens. For example, a number in the format (NNN) NNN-NNNN would be recorded as NNNNNNNNNN. If known, provide the telephone extension number in the associated field. Telephone numbers that are part of the North American Numbering Plan used by the U.S., Canada, many Caribbean countries, and present/former U.S. Pacific island protectorates must consist of an area code and seven-digit telephone number. Other foreign telephone numbers should include the country number code. If only a partial telephone number is known, record that number in the phone number item.

12. Identifying numbers: Enter all identifying numbers as a single text string without formatting or special characters such as hyphens or periods. An identifying number in the format NNN-NN-NNNN would be entered as NNNNNNNNNN. Such numbers may include letter and number characters. Common identifying numbers include account numbers, alien registration numbers, driver's license and state identification numbers, Employer Identification Numbers (EIN), passport numbers, Social Security Numbers (SSN), and industry specific identifiers such as National Futures Association (NFA) numbers and Securities and Central Registration Depository (CRD) numbers.

13. Monetary amounts: Record all U.S. Dollar amounts rounded up to the next whole dollar. The amount \$15,265.25 would be recorded as \$15,266. A foreign currency amount can only be recorded in Item 26 "Foreign cash in" or Item 28 "Foreign cash out," again rounded up to the next whole amount. When converting a foreign currency to dollars use an exchange rate for the date of the transaction.

14. Determining whether transactions meet the reporting threshold: Only cash transactions that, if alone or when aggregated, exceed \$10,000 should be reported on the FinCEN CTR. Transactions shall not be offset against one another. If there are both Cash In and Cash Out transactions that are reportable, the amounts should be considered separately and not aggregated. However, they may be reported on a single FinCEN CTR. If there is a currency exchange, it should be aggregated separately with each of the cash in and cash out totals.

Example 1: A person deposits \$11,000 in currency to his savings account and withdraws \$3,000 in currency from his checking account. The FinCEN CTR should be completed as follows:

Item 25 "Total cash in" is \$11,000, with no entry in Item 27 "Total cash out." This is because the \$3,000 transaction does not meet the reporting threshold.

Example 2: A person deposits \$11,000 in currency to his savings account and withdraws \$12,000 in currency from his checking account. The FinCEN CTR should be completed as follows:

Item 25 "Total cash in" is \$11,000. Item 27 "Total cash out" is \$12,000. This is because there are two reportable transactions. However, one FinCEN CTR may be filed to reflect both.

Example 3: A person deposits \$6,000 in currency to his savings account and withdraws \$4,000 in currency from his checking account. Further, he presents \$5,000 in currency to be exchanged for the equivalent in Euro's. The FinCEN CTR should be completed as follows:

Item 25 "Total cash in" is \$11,000, with no entry in Item 27 "Total cash out." This is because in determining whether the transactions are reportable, the currency exchange is aggregated with each of the Cash In and Cash Out amounts. The result is a reportable \$11,000 cash in transaction. The total cash out amount is \$9,000, which does not meet the reporting threshold. Therefore, the cash out amount is not entered on the FinCEN CTR.

Example 4: A person deposits \$6,000 in currency to his savings account and withdraws \$7,000 in currency from his checking account. Further, he presents \$5,000 in currency to be exchanged for the equivalent in Euros. The FinCEN CTR should be completed as follows:

Item 25 "Total cash in" is \$11,000. Item 27 "Total cash out" is \$12,000. This is because in determining whether the transactions are reportable, the currency exchange is aggregated with each of the Cash In and Cash Out amounts. In this example, each of the Cash In and Cash Out totals exceeds \$10,000 and must be reflected on the FinCEN CTR. The amount of Euros received in the currency exchange would be entered in Item 28 Foreign Cash Out.

15. Prohibited words and phrases: Do not use the following words or variations of these words in fields:

- a. AKA
- b. COMPUTER GENERATED
- c. CUSTOMER
- d. DBA
- e. NONE
- f. NOT APPLICABLE

- g. NON CUSTOMER
- h. OTHER
- i. SAME
- j. SAME AS ABOVE
- k. SEE ABOVE
- l. SIGNATURE CARD
- m. UNKNOWN
- n. VARIOUS
- o. XX

16. Name Editing Instructions. Because many names do not consist of a single first name, middle name, and last name, care must be taken to ensure these names are entered properly in the BSA SAR. This is especially important when there are separate fields for the last name, first name, and middle name. Some names have multiple surnames (family names) or multiple given names that do not include a middle name. Others may not be written in [first name] [middle name] [last name] order. Multiple surnames must be entered in the last name field. For example, Hispanic names may be written in the order of given name, father's last name, and mother's last name, e.g., "Juan Vega Santiago." Thus the surname "VEGA SANTIAGO" would be entered in the last name field with "JUAN" entered in the first name field. Some Hispanic surnames consist of three names (e.g., father's last name, mother's last name, and husband's father's last name in the case of a married woman). In that case all three would be entered in a last name field. Hispanic names do not have middle names, so a multiple Hispanic given name such as "Rosa Maria" would be recorded in the first name field. In some cultures names consist of multiple first names and a single family name, not necessarily in (first name) (last name) order. For example, the Korean name "Kim, Chun Nam" consists of the family name "Kim" and the first name "Chun Nam" separated by a comma and space. There is no middle name. In this case "KIM" would be entered in the last name field and "CHUN NAM" would be entered in the first name field. Nothing is entered in the middle name field. When an individual name is entered in a single name field it should be entered in [first name] [middle name] [last name] order regardless of any foreign naming conventions. Thus, "Kim, Chun Nam" would be entered as "CHUN NAM KIM" in a single name field. Punctuation and special characters should be used in names only when they are part of the name. For example, the period in "Expedia.Com" should be included because it is part of the name. Placing a period after a middle initial would be prohibited because the period is not part of the middle name. Abbreviations in names are prohibited unless an abbreviation is part of a legal name. Entry of middle initials is permitted when a middle name is unknown. A name suffix may be abbreviated, i.e. Junior can be JR, Senior can be SR, the Third can be III, etc.

Item Instructions

NOTE: Critical fields in the FinCEN CTR are identified with the * symbol in front of the data element number.

*1. Type of filing (check box that applies):

- a. Initial report
- b. Correct/amend prior report
- c. FinCEN directed Backfiling
- d. Prior report Document Control Number/BSA Identifier

Item *1 Type of filing: Check box 1a "Initial report" if this is the first report filed on the currency transaction(s). FinCEN CTRs filed as a result of a historical or other review of past transactional activity, either directed by a regulating authority other than FinCEN or on the financial institution's own initiative, must always be identified as initial reports. Check box 1b "Correct/amend prior report" if the report corrects or amends a previously-filed CTR. See General Instruction 9 for additional instructions on filing corrected or amended CTRs. Check box 1c "FinCEN directed Backfiling" if FinCEN directed the financial institution to file the FinCEN CTR on a currency transaction or transactions not previously reported. If box 1b is checked, the prior report's Document Control Number (DCN) or BSA Identifier (BSA ID) must be recorded in field 1d. Enter all zeros if the prior report DCN or BSA ID is unknown, for example when the prior report was a paper filing. The BSA ID is replacing the DCN in all future electronic filings.

Part I Person Involved in Transaction

Complete a separate Part I section on each individual or entity involved in the currency transaction(s). Complete each Part I section with as much of the requested information as is known about the individual or entity. Required items, denoted by an asterisk (*) in front of the item number, must be completed by providing the data or by checking the "Unknown" box associated with the item. There must be at least one Part I in the FinCEN CTR where either box 2a or box 2c was checked.

*2. a. Person conducting transaction on own behalf

- b. Person conducting transaction for another
- c. Person on whose behalf transaction is conducted
- d. Courier service (private)

Item 2: Select option 2a if the person recorded in Part I conducted the transaction(s) on his or her own behalf. Option 2a cannot be selected if box 4b "If entity" is checked. Select option 2b if the person recorded in Part I conducted the transaction(s) on behalf of a different person. Select

option 2c if the transaction was conducted by a different person on behalf of the person recorded in Part I. Select option 2d if the transaction(s) were conducted by the agent of a private courier service such as an armored car company engaged by the person(s) involved in the transaction(s) and not by the reporting financial institution. In that case the information on the courier service's agent will be recorded in Part I (see FIN-2009-R002). Boxes 2a, 2b, and 2d cannot be checked if box 4b "If entity" is checked."

NOTE: If more than one Item 2 option applies to a person involved in the transaction(s), complete only one Part I on that person with only one entry in Item 2. Select "Courier Service" if multiple options that include 2d "Courier service" apply. Select 2a "Person conducting transaction on own behalf" if options 2a, 2b, and 2c or options 2a and 2c apply. Select 2b "Person conducting transaction for another" if both 2b and 2c apply.

3. Multiple transactions

Item 3 Multiple transactions: Check box 3 if multiple cash in or cash out transactions of any amount were conducted in a single business day by or for the person recorded in Part I. "Multiple transactions" is not the same as the Item 24 option "Aggregated transactions," which only involves multiple transactions all of which are below the reporting requirements.

* 4. Individual's last name or entity's legal name

- a. (Check if) Unknown
- b. (Check if) If entity

Item *4 Individual's last name or entity's legal name: Enter the individual's last name or the entity's legal name. The entity legal name is the name on the articles of incorporation or other document that established the entity. If an entity is being recorded in Part I, check box 4 "If entity." Do not check box 4 "If entity" if the person involved in the transaction is a sole proprietorship. See FinCEN Ruling FIN-2008-R001 for additional information on reporting currency transactions that involve sole proprietorships. As stated in FIN-2008-R001, FinCEN will continue to accept two Part I sections (previously "Section A" on FinCEN Form 104) on sole proprietorships containing both the personal and business information. Do not check box 4b if an individual's name is entered in Items 4-6. If the individual's last name or entity's legal name is unknown leave Item 4 blank and check box 4 "Unknown." Do not record also known as (AKA) or doing business as (DBA) names in Item 4. Record these names instead in Item 8 "Alternate name."

* 5. First name

- a. (Check if) Unknown

Item *5 First name: Enter the individual's first name. If the first name is unknown leave item 5 blank and check box 5 "Unknown." Do not record also known as (AKA) or doing business as (DBA) names in Item 5. Record these names instead in Item 8 "Alternate name."

6. Middle name and Name suffix

Item 6 Middle name: Enter the individual's middle name or middle initial. Leave this item blank if the middle name or middle initial is unknown or does not apply. Do not record also known as (AKA) or doing business as (DBA) names in Item 6. Record these names instead in Item 8 "Alternate name."

Item 6 Name suffix: Enter the individual's name suffix such as JR, SR, III, etc. if it is part of the individual's legal name. Leave this item blank if the suffix is unknown or does not apply.

7. Gender

- a. *(Check if)* Male
- b. *(Check if)* Female
- c. *(Check if)* Unknown

Item 7 Gender: Select option 7a Male or 7b Female if the person's gender is known. Select option 7c "Unknown" if the person's gender is unknown. Leave this item blank if the person is an entity. Item 7 does not create an obligation for a financial institution to collect this data when such collection would be in conflict with the financial institution's obligations under any other federal law.

8. Alternate name, e.g., AKA - individual or DBA - entity

Item 8 Alternate name: Enter the individual's also known as (AKA) name or the entity's doing business as (DBA) name if different from the name entered in Items 4-6. Do not include the acronyms AKA or DBA with the name. Do not enter AKA or DBA names in Items 4-6.

9. Occupation or type of business

- a. NAICS Code

Item 9 Occupation or type of business: Record the occupation, profession, or type of business of the individual or entity recorded in Part I. Use specific descriptions such as doctor, carpenter, attorney, used car dealership, plumber, truck driver, hardware store, etc. Do not use non-descriptive items such as businessman, merchant, retailer, retired, or self-employed. If words like self-employed, unemployed, or retired are used, add the current or former profession if known (e.g. self-employed building contractor, retired teacher, or unemployed carpenter).

Item 9a NAICS Code: Enter the North American Industry Classification System (NAICS) code for the occupation or type of business entered in Item 9. Access the list of NAICS Codes authorized for use in the FinCEN CTR on the BSA E-Filing Web Site (<http://bsaefiling.fincen.treas.gov/main.html>)

* 10. Address (number, street, and apt. or suite no.)

x. *(Check if)* Unknown

Items *10 - *14 Person's address items: Enter the person's permanent street address, city, two or three letter state/territory/province abbreviation (U.S./Canada/Mexico only), ZIP Code or foreign postal code, and two letter country abbreviation. Complete any address item that is known, even if the whole address is unknown. If an address item is unknown, leave that item blank and check box "Unknown." See General Instruction 10 for additional information on entering addresses.

* 11. City

a. *(Check if)* Unknown

* 12. State

a. *(Check if)* Unknown

* 13. ZIP/Postal code

a. *(Check if)* Unknown

* 14. Country code

a. *(Check if)* Unknown* 15. TIN *(enter number in space provided and check appropriate type below)*a. *(Check if)* Unknown

Item *15 TIN: Enter the person's U.S. or foreign taxpayer identification number (TIN) without formatting or punctuation. If the number is unknown, check box 15 "Unknown" and leave Item 15 blank. See General Instruction 12 for information on entering identifying numbers.

16. TIN type

- a. EIN
- b. SSN-ITIN
- c. Foreign

Item 16 TIN type: Identify the type of TIN recorded in Item 15. Select option "EIN" if the person has a U.S. Employer Identification Number (EIN). Select option "SSN-ITIN" if the person has a U.S. Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN). Select option "Foreign" if the person has a foreign TIN of any type. Box 4b also must be checked if the foreign person is an entity. Enter the person's TIN type if known even if the actual TIN is

unknown and Item 15a is checked. If a 9-digit TIN is entered in Item 15 but the TIN type is unknown, select "EIN" if the person is an entity and "SSN-ITIN" if the person is an individual. TINs that are not 9 digits are presumed to be foreign, so option "Foreign" would be selected.

* 17. Date of birth

a. *(Check if)* Unknown

Item *17 Date of birth: Enter the individual's date of birth in Item 17. Batch filers will use the format MMDDCCYY format where MM = month, DD = day, CC = century, and YY = year. The format MM/DD/CCYY must be used in Item 17 on the BSA E-Filing discrete FinCEN CTR. Any single digit month or day must be preceded by a zero. If the birth day and or month is unknown, enter "00" for the unknown day or month. For example, a date of birth with an unknown day in February 1978 would be entered as 02001978. Do not enter zeros for the year if the year is unknown. If the year of birth or the entire date of birth is unknown, check box 17 "Unknown" and leave Item 17 blank. If box 4 "If entity" is checked, Item 17 and box 17 "Unknown" must be blank.

18. Contact phone number (if available)

18a. Ext. (if any)

Item 18 Contact phone number: Enter the person's U.S. or foreign contact telephone number with no formatting such as parentheses, spaces, or hyphens. If the telephone number is unknown, leave item 18 blank. See General Instruction 11 for instructions on entering telephone numbers.

Item 18a Ext. (if any): Enter the telephone extension associated with the contact telephone number. Leave Item 18a blank if there is no extension or the extension is unknown.

19. E-mail address (if available)

Item 19 E-mail address: Enter the person's e-mail address if known. Include all formatting, punctuation, and special characters in the e-mail address. An e-mail address must contain the "@" sign with a period in the following text, e.g. johndoe@business.com or richardroephd@college.edu. Leave Item 19 blank if the e-mail address is unknown.

*20. Form of identification used to verify identity:

- a. *(Check if)* Unknown
- b. *(Check if)* Driver's license/State I.D.
- c. *(Check if)* Passport
- d. *(Check if)* Alien registration
- e. Issuing State
- f. Country

g. Number

z. (Check if) Other (and specify type in space provided)

Item *20 Form of identification: Enter in Item 20 the information used to identify the individual or entity recorded in Item 4. Check box 20b if the identification was a driver's license or state ID, box 20c if the identification was a passport or box 20d if the identification was an alien registration. Check box 20z if a different identification was provided and describe that identification in the "Other" text field. "Other" identification could include such things as an entity's business license or incorporation documents, corporate ID cards, local government ID cards, etc. Enter the identification number in field 20g "Number." Do not include formatting such as spaces, hyphens, or periods in the number. Enter the appropriate two or three-letter abbreviation or code in field 20e "Issuing State" if the identification issuer was a U.S., Canadian, or Mexican state, territory, or province. Enter the appropriate two-letter code in field 20f "Country" if the issuer was a country. If field 20e "Issuing State" contains an entry, then 20f "Country" must contain "US," "CA," or "MX" as appropriate. See General Instruction 10 for information about the codes to be entered. If the identification issuer does not have a code in this document, enter the two letter code for the issuer's country in field 20f. For example, if the issuer was the London Police Department the code "GB" for United Kingdom would be entered in 20f. Enter all identification data that is available. Check box 20a "Unknown" only if the individual or entity is known and all identification information is unknown. See General Instruction 12 for further information on entering identifying numbers.

21. Cash in amount for individual or entity listed in item 4

a. Acct. number(s) included in item 21

Item 21 Cash in amount: Enter the total cash in amount denominated in U.S. Dollars for the person recorded in Item 4. This amount cannot be greater than the amount in Item 25 "Total cash in." Record the account numbers of all accounts involved in the transaction(s). See General Instructions 12 and 13 for additional instructions on entering account numbers and amounts.

22. Cash out amount for individual or entity listed in item 4

a. Acct. number(s) included in item 22

Item 22 Cash out amount: Enter the total cash out amount denominated in U.S. Dollars for the person recorded in Item 4. This amount cannot be greater than the amount in Item 27 "Total cash out." Record the account numbers of all accounts involved in the transaction(s). See General Instructions 12 and 13 for additional instructions on entering account numbers and amounts.

Part II Amount and Type of Transaction(s)*** 23. Date of transaction**

Item *23 Date of transaction: Enter the date of the transaction(s) in Item 23. Batch filers will use the format MMDDCCYY format where MM = month, DD = day, CC = century, and YY = year. The format MM/DD/CCYY must be used in Item 23 on the BSA E-Filing discrete FinCEN CTR. Any single digit month or day must be preceded by a zero.

- 24 a. (Check if) Armored car (FI contract)
b. (Check if) ATM
c. (Check if) Mail Deposit or Shipment
d. (Check if) Night Deposit
e. (Check if) Aggregated transactions

Item 24: Indicate whether any of the following delivery/payment methods were involved in any part of the transaction(s). Check all that apply. Check box 24a "Armored Car" if a reported transaction involved a pick-up or delivery of currency by an armored car service under contract to the financial institution listed in Part III. Do not check box 24a if the armored car service was under contract to a person recorded in Part I. Check box 24b "ATM" if a reported transaction occurred at an automated teller machine (ATM). Check box 24c "Mail Deposit or Shipment" if a reported transaction was made by mail deposit or shipment. Check box 24d "Night Deposit" if a reported transaction involved a night deposit of cash. Check box 24e "Aggregated transactions" if the financial institution did not identify any of the transactor(s) because the FinCEN CTR reports aggregated transactions, all of which was below the reporting requirement, and at least one of the aggregated transactions was a teller transaction. The option "Aggregated transactions" is not the same as Item 3 "Multiple transactions," which can involve transactions that are above the reporting requirement.

***25. Total cash in**

- a. Deposit(s)
b. Payment(s)
c. Currency received for funds transfer(s) out
d. Purchase of negotiable instrument(s)
e. Currency exchange(s)
f. Currency to prepaid access
g. Purchase(s) of casino chips, tokens, and other gaming instruments
h. Currency wager(s) including money plays
i. Bills inserted into gaming devices

z. Other (specify)

Item *25 Total cash in: Record the total cash in amount involved in the transaction(s) if that amount is greater than \$10,000. Record the total amount on the "Total cash in" line and total or subtotals on whichever of line 25a through 25i best describe the transaction or aggregated transactions. If any portion of the total amount is not described by any of those options, record that portion on line 25z and provide a brief description of the transaction(s) in the "Other" text field. If the total amount of the cash in transaction or aggregated transactions is \$10,000 or less, do not record any amounts in Item 25. The total of the amounts recorded in fields 25a through 25z must equal the amount recorded in the Item 25 "Total cash in" field. The total cash in will be automatically computed in BSA E-Filing discrete FinCEN CTR from the entries in 25a through 25i and 25z. See General Instruction 14 for instructions on determining whether transactions are reportable on a FinCEN CTR.

26. Foreign cash in

a. Foreign country (two letter code)

Item 26 Foreign cash in: If the cash in transaction(s) involved a foreign currency or currencies, enter the total amount of each foreign currency in Item 26 and the two letter code for the country that issued the currency in Item 26a. Complete an Item 26 and 26a for each foreign currency involved. Do not convert amounts to U.S. Dollars. Round fractional amounts up to the next whole amount. For example, 21,527.25 Euros would be recorded as 21, 528. See General Instruction 10 for information about the codes to be entered.

*27. Total cash out

- a. Withdrawal(s)
- b. Advance(s) on credit (including markers)
- c. Currency paid from funds transfer(s) in
- d. Negotiable instrument(s) cashed
- e. Currency exchange(s)
- f. Currency from prepaid access
- g. Redemption(s) of casino chips, tokens, TITO tickets, and other gaming instruments
- h. Payment(s) on wager(s)(including race book and OTB or sports pool
- i. Travel and complimentary expenses and gaming incentives
- j. Payment for tournament, contest or other promotions
- z. Other (specify)

Item *27 Total cash out: Record the total cash out amount involved in the transaction or aggregated transactions if that amount is greater than \$10,000. Record the total amount on the

“Total cash out” line and total or subtotals on whichever of line 27a through 27j best describe the transaction or aggregated transactions. If any portion of the total amount is not described by any of those options, record that portion on line 27z and provide a brief description of the transaction in the “Other” text field. If the total amount of the cash out transaction or aggregated transactions is \$10,000 or less, do not record any amounts in Item 27. The total of the amounts recorded in fields 27a through 27z must equal the amount recorded in the Item 27 “Total cash out” field. The total cash out will be automatically computed in BSA E-Filing discrete FinCEN CTR from the entries in 27a through 27j and 27z. See General Instruction 14 for instructions on determining whether transactions are reportable on a FinCEN CTR.

NOTE: In the casino industry “TITO” refers to ticket in/ticket out and “OTB” refers to off-track betting.

28. Foreign cash out

a. Foreign country (two letter code)

Item 28 Foreign cash out: If the cash out transaction(s) involved a foreign currency or currencies, enter the total amount of each foreign currency in Item 28 and the two letter code for the country that issued the currency in Item 28a. Complete an Item 28 and 28a for each foreign currency involved. Do not convert amounts to U.S. Dollars. Round fractional amounts up to the next whole amount. For example, 21,527.25 Euros would be recorded as 21, 528. See General Instruction 10 for information about the codes to be entered.

Part III Financial Institution Where Transaction(s) Takes Place

Prepare a separate Part III Financial Institution section for each financial institution branch involved in aggregated currency transactions.

* 29. Primary federal regulator

Item 29 Primary federal regulator: Identify the financial institution’s primary federal regulator or BSA examiner from the following list. If more than one regulator option could apply, select the regulator that has primary responsibility for enforcing compliance with the BSA. Option “D” for Internal Revenue Service must be entered if the institution is subject to US law and none of the other codes apply. The regulator options are:

A = Commodities Futures Trading Commission (CFTC)

B = Federal Reserve Board (FRB)

C = Federal Deposit Insurance Corporation (FDIC)

D = Internal Revenue Service (IRS)

E = National Credit Union Administration (NCUA)

F = Office of the Comptroller of the Currency (OCC)

G = Securities and Exchange Commission (SEC)

* 30. Legal name of financial institution

Item 30 Legal name of financial institution: Enter the legal name of the financial institution as recorded on articles of incorporation or other documents establishing the institution. If an individual's name is recorded, enter the name in (first name) (middle name) (last name) or equivalent format, e.g. John Jacob Doe or Richard R. Roe II, etc. An individual's name might be recorded when, for example, the financial institution is a sole proprietorship.

31. Alternate name, e.g., trade name, DBA

Item 31 Alternate name: If the financial institution recorded in Item 30 has a separate trade name or doing business as (DBA) name, enter that name here. Do not enter a trade or DBA name in Item 30 or a legal name in Item 31. Do not include acronyms such as DBA or AKA with the alternate name.

* 32. EIN

Item 32 - EIN: Enter the financial institution's Employer Identification Number (EIN). If the financial institution is a sole proprietorship operating under the sole proprietor's TIN, enter that TIN in Item 32. See General Instruction 12 for information on entering identifying numbers.

* 33. Address (number, street, and apt. or suite no.)

Items *33 - *36 Financial institution address items: Enter the financial institution's permanent street address, city, two letter state abbreviation, and ZIP Code. See General Instruction 10 for information about the codes to be entered. Provide a suite number if known. A non-location address such as a post office box or rural route number should be used only if the street address information is not available. ZIP Codes must be five or nine digits. See General Instruction 10 for additional instructions on entering addresses.

* 34. City

* 35. State

* 36. ZIP Code

* 37. Type of financial institution (Check only one)

a. (Check if) Casino/Card club

b. (Check if) Depository institution

- c. (Check if) MSB
- d. (Check if) Securities/Futures
- z. (Check if) Other (and specify type in space provided)

Item *37 Type of financial institution: Check the appropriate option to identify the type of financial institution recorded in Item 30. If option 37z "Other" is selected, enter a brief description of the financial institution in the associated text field.

38. If 37a is checked, indicate type (Check only one)

- a. (Check if) State licensed casino
- b. (Check if) Tribal authorized casino
- c. (Check if) Card club
- z. (Check if) Other (and specify type in space provided)

Item 38 Type of gaming institution: If box 37a "Casino/Card club" is checked, check the appropriate Item 38 box to indicate the type of gaming institution. If box 38z is checked, record a brief description in the associated "Other" text field.

39. Financial institution ID number (Check one box to indicate type)

- a. Central Registration Depository (CRD) number
- b. Investment Advisor Registration Depository (IARD) number
- c. National Futures Association (NFA) number
- d. Research, Statistics, Supervision, and Discount (RSSD) number
- e. Securities and Exchange Commission (SEC) number
- f. ID number

Item 39 Financial institution ID number: Select the appropriate option from 39a through 39e to record the type of identification number being entered for the financial institution. Enter that number in field 39f "ID number." Leave Item 39 blank if these options do not apply to the financial institution. See General Instruction 12 for information on entering identifying numbers.

* 40. Contact office

Item *40 Contact office: Enter the name of the financial institution office that should be contacted to obtain additional information about the report.

* 41. Phone number

- a. Ext.

Item 41 Phone number: Enter the financial institution's contact telephone number. See General Instruction 11 for additional instructions on entering telephone numbers.

Item 41a Ext. (if any): Enter the telephone extension associated with the contact telephone number. Leave Item 41a blank if there is no extension.

42. Date filed

Item 42 Date filed: Enter the date a batch filed FinCEN CTR is filed in MMDDCCYY format where MM = month, DD = day, CC = century, and YY = year. Single digit days or months must be prefaced by a zero. This date will automatically be added to a discrete FinCEN CTR when a filer signs the FinCEN CTR.